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October 29, 1998

Ms. Carol M. Browner  
United States Environmental Protection Agency  
Washington, D.C. 20460

DOCKET 201-AR

Dear Ms. Browner:

Re: EPA HPV Challenge Program

Thank you for your letter of October 9, 1998 which I received on October 16, 1998. In responding to your request for my company's commitment to the Challenge Program, I can assure you that ICI Americas intends to do its fair share of testing those HPV chemicals that we make for which additional SIDS data are considered necessary.

You will not be surprised that we are not the sole manufacturer of most of the HPV chemicals on our list. We are thus working closely with our colleagues in a range of cooperative programs to review the need for additional information and testing. The organizations in which we are active include:

CMA's CHEMSTAR Program  
Methacrylate Producers Association (MPA)  
Halogenated Solvents Industrial Association (HSIA)  
Soap and Detergent Association (SDA)  
International Isocyanate Institute (III)  
Research Institute for Fragrance Manufacturers (RIFM)

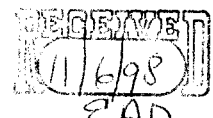
to name but a few.

When these several groups have agreed their testing priorities, I will write to you again to let you know the programs in which we are actively participating. I will also keep you apprised of our decisions on those chemicals of which we appear to be the sole manufacturer.

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To the extent possible, we intend to maintain - and will encourage our partners to adhere to - a risk-based approach to HPV testing i.e. to test first those chemicals whose properties, end uses, exposure patterns, etc. may suggest a higher potential risk from an unrecognized hazard than would be the case for other HPVs.

Sincerely,

J. R. Danzeisen  
Chairman

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